

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

### This Document Relates To:

*The School Board of Hillsborough County, Florida  
v. Meta Platforms, Inc., et al., No. 24-cv-01573*

*Board of Education of Jordan School District v. Meta Platforms, Inc., et al.*, No. 24-cv-01377

*Tucson Unified School District v. Meta Platforms, Inc., et al.*, No. 24-cv-01382

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

Judge: Hon. Yvonne Gonzalez Rogers

**DECLARATION OF JOSEPH  
SANDOVAL-BUSHUR IN SUPPORT  
OF DEFENDANTS' MOTION TO  
PRECLUDE PLAINTIFFS FROM  
RELYING ON LATE-DISCLOSED  
SCHOOL DISTRICT WITNESSES**

I, Joseph Sandoval-Bushur, declare and state as follows:

1. I am an attorney admitted to practice in the District of Columbia and State of Missouri, and admitted to practice *pro hac vice* in the above-entitled action. I am associated with the law firm of Williams & Connolly, LLP, counsel for Defendant YouTube, LLC, Google LLC, and Alphabet Inc. I make this declaration in support of Defendants' Motion to Preclude Plaintiffs from Relying on Late-Disclosed School District Witnesses. This declaration is based on my own personal knowledge and, if called to testify as to the truth of the matters set forth herein, I could and would competently testify thereto. I offer this declaration without waiving or intent to waive attorney-client privilege.

2. Attached as Exhibit A is a true and correct copy of Plaintiff's Third Amended  
Answers to Defendants' Interrogatories to the School Board of Hillsborough County, Florida (Set  
1) dated April 4, 2025, with redactions required under Fed. R. Civ. P. 5.2(a)(3).

3. Attached as Exhibit B is a true and correct copy of Plaintiff's Third Amended Answers to Defendants' Interrogatories to Board of Education of Jordan School District (Set 1) dated April 4, 2025, with redactions required under Fed. R. Civ. P. 5.2(a)(3).

1       4.       Attached as Exhibit C is a true and correct copy of Plaintiff's Third Amended  
2 Answers to Defendants' Interrogatories to Tucson Unified School District (Set 1) dated April 4,  
3 2025, with redactions required under Fed. R. Civ. P. 5.2(a)(3).

4       5.       Attached as Exhibit D is a true and correct copy of Plaintiff's Answers to  
5 Defendants' Interrogatories to the School Board of Hillsborough County, Florida (Set 1) dated  
6 June 6, 2024.

7       6.       Attached as Exhibit E is a true and correct copy of Plaintiff's Answers to  
8 Defendants' Interrogatories to Board of Education of Jordan School District (Set 1) dated June 6,  
9 2024.

10       7.       Attached as Exhibit F is a true and correct copy of Plaintiff's Answers to  
11 Defendants' Interrogatories to Tucson Unified School District (Set 1) dated June 6, 2024.

12       8.       Attached as Exhibit G is a true and correct copy of School District Plaintiffs'  
13 Initial Disclosure Statement Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A) dated  
14 February 22, 2024.

15       9.       Attached as Exhibit H is a true and correct copy of a letter from Michael M.  
16 Weinkowitz to Defendants' counsel dated July 21, 2023.

17       10.       Attached as Exhibit I is a true and correct copy of a letter from Dean Kawamoto,  
18 Michael M. Weinkowitz, and Melissa L. Yeates to Defendants' counsel dated December 7, 2023.

19       11.       Attached as Exhibit J is a true and correct copy of a letter from Michael M.  
20 Weinkowitz and Melissa L. Yeates to Defendants' counsel dated July 24, 2024.

21       12.       Attached as Exhibit K is a true and correct copy of the Reporter's Transcript of  
22 Proceedings, Motion for Summary Judgment and Case Management Conference, dated October  
23 7, 2022 in *In re Juul Labs, Inc., Marketing, Sales Practices and Products Liability Litigation*, No.  
24 3:19-md-02913.

25       13.       Attached as Exhibit L is a true and correct copy of an excerpt of the transcript of  
26 the fact witness deposition of B.D. (Board of Education of Jordan School District).

14. Attached as Exhibit M is a true and correct copy of Plaintiff's Supplemental Answers to Defendants' Interrogatories to St. Charles Parish School District (Set 1) dated April 28, 2025, with redactions required under Fed. R. Civ. P. 5.2(a)(3).

Dated: May 9, 2025

By: /s/ Joseph Sandoval-Bushur

## Joseph Sandoval-Bushur

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